

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JOSE RAMOS,	:	
Plaintiff,	:	
	:	CIVIL ACTION FILE
v.	:	
	:	NO. 1:07-CV-1772-RLV-GGB
COLLECTIONWORKS, INC.,	:	
Defendant.	:	
_____	:	

PLAINTIFF'S FIRST AMENDMENT TO COMPLAINT

COMES NOW PLAINTIFF, pursuant to Rule 15(a), Fed.R.Civ.P., and prior to the filing of any responsive pleading, and amends as a matter of course his complaint to reflect that it is an individual action and not an action brought on behalf of a class of similarly situated consumers, as follows:

I.

PLAINTIFF amends his Complaint by replacing paragraph 1 with the following language:

JOSE RAMOS brings this action on behalf of himself against Defendant COLLECTIONWORKS, INC. for violations of the Fair Debt Collection Practices Act, 15 USC section 1692 et seq. (Hereinafter "FDCPA").

II.

PLAINTIFF further amends his Complaint by deleting paragraphs 2, 4, and the section containing CLASS ACTION ALLEGATIONS contained in paragraphs 34 through 54.

III.

PLAINTIFF further amends his Complaint by replacing paragraph 55 with the following language:

Defendant's violations of the FDCPA with regard to Plaintiff include (but are not limited to) the following:

IV.

PLAINTIFF amends and restates the Prayer for Relief as follows:

WHEREFORE, Plaintiff requests that judgment be entered for himself against Defendant COLLECTION for:

- A. Actual damages pursuant to 15 U.S.C. §1692k(a)(1);
- B. Statutory damages pursuant to 15 U.S.C. §1692k(a)(2);
- C. Costs and reasonable attorneys fees pursuant to 15 U.S.C. §1692k(a)(3); and
- D. Such other and further relief as the Court deems just and equitable.

Respectfully submitted,

THE LAW OFFICE OF KRIS SKAAR, P.C.

By: /s/ Kris Skaar
Kris Skaar
Attorney for plaintiff
Georgia Bar No. 649610

P.O. Box 1478 • Marietta, GA 30061-1478
331 Washington Avenue • Marietta, GA 30060
(770) 427 - 5600

THE LAW OFFICE OF JAMES M. FEAGLE, ESQ.

by: /s/ James M. Feagle
James M. Feagle
Attorney for Plaintiff
Georgia Bar No. 256916

108 East Ponce de Leon Avenue
Suite 204
Decatur, GA 30030
404 / 373-1970

CERTIFICATE OF COMPLIANCE WITH LR 5.1B & 7.1D, NDGa.

Pursuant to LR 7.1D, NDGa., I certify that this document has been prepared with one of the font and point selections approved by the court in LR 5.1B, to wit:

☒ Times New Roman, 14 point; or

☐ Courier New, 12 point.

This 12th day of November, 2007.

THE LAW OFFICE OF JAMES M. FEAGLE, P.C.

by: /s/ James M. Feagle
James M. Feagle
Attorney for Plaintiff
Georgia Bar No. 256916

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